

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TERA KNOLL,	:	
Plaintiff	:	
v.	:	No. 08-4692
	:	
CITY OF ALLENTOWN,	:	
Defendant	:	

JURY INTERROGATORIES

1. Was there a causal connection between Ms. Knoll's complaints of sexual harassment and the City of Allentown's decision to terminate her?

YES _____ NO X _____

If you answered YES, proceed to the next question. If NO, proceed to Question 4.

2. Has the City of Allentown offered a legitimate, non-discriminatory reason for the termination of Ms. Knoll?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, proceed to Question 4.

3. Was the City of Allentown's non-discriminatory reason for terminating Ms. Knoll pretextual?

YES _____ NO _____

Proceed to the next Question.

4. Was there a causal connection between Ms. Knoll's complaints of sexual harassment and the City of Allentown's decision not to promote her to a maintenance worker II position?

YES _____ NO X

If you answered YES, proceed to the next question. If NO, proceed to Question 7.

5. Has the City of Allentown offered a legitimate, non-discriminatory reason for its decision not to promote Ms. Knoll?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, proceed to Question 7.

6. Was the City of Allentown's non-discriminatory reason for not promoting Ms. Knoll pretextual?

YES _____ NO _____

Proceed to the next Question.

7. Was Ms. Knoll subjected to unwelcomed sexually harassing conduct?

YES _____ NO X

If you answered this Question YES, proceed to the next Question. If you answered this Question NO, please proceed to question 13.

8. If you found that Ms. Knoll was subjected to unwelcomed harassment, was said harassment motivated by the fact that Ms. Knoll is a woman?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, please proceed to question 13.

9. If you found that Ms. Knoll was subjected to unwelcomed harassment, was the harassment so severe and pervasive that a reasonable person would find the work environment to be hostile or abusive?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, please proceed to question 13.

10. Did Ms. Knoll consider the work environment to be hostile or abusive?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, please proceed to question 13.

11. Did Ms. Knoll suffer an adverse tangible employment action as a result of any hostile work environment that you have found?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, please proceed to question 13.

12. Did the City of Allentown know or should have known of the harassing conduct and failed to take prompt or immediate action?

YES _____ NO _____

If you answered YES, proceed to the next Question. If you answered NO, please proceed to question 13.

13. If you answered yes to question 3 and/or question 6 and/or question 12, state the amount of damages you would award Ms. Knoll. If you answered no to questions 3, 6 and 12, please follow the directions below.

\$ _____

(You have concluded your deliberations. Please have the Jury Foreperson sign and date below, notify a member of the judge's staff that you have reached your verdict, and await further instructions).

John R. H. Lee

FOREPERSON

July 1, 2010

DATE